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7 Attorneys for Defendant  
*Cobra Thermosolar Plants, Inc.*

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 THE PRIVATE BANK AND TRUST  
11 COMPANY, a Delaware corporation,

12 Plaintiff,

13 v.

14 COBRA THERMOSOLAR PLANTS, INC., a  
15 Nevada corporation,

16 Defendant.

Case No. 2:16-cv-00983-KJD-VCF

STIPULATION AND  
~~PROPOSED~~ ORDER TO  
RESPOND TO COMPLAINT

17 COMES NOW, Defendant, COBRA THERMOSOLAR PLANTS, INC.  
18 ("Defendant"), by and through its counsel of record, William J. Wray, Esq. and Donna  
19 DiMaggio, Esq. of the law firm of HOLLEY DRIGGS WALCH FINE WRAY PUZEY  
20 & THOMPSON, and Plaintiff, THE PRIVATE BANK AND TRUST COMPANY  
21 ("Plaintiff"), by and through its counsel of record, Shan Davis, Esq. of the law firm of  
22 DAVIS|STIBOR, (Plaintiff and Defendant are hereinafter collectively referred to as  
23 "Parties") and hereby agree and stipulate as follows:

24 Plaintiff filed a Complaint on May 2, 2016. The Parties are actively engaged in  
25 settlement discussions and wish to continue said discussions without incurring the cost of  
26 litigation. As such, the Parties agree to allow Defendant an open extension to respond to  
27 the Complaint.

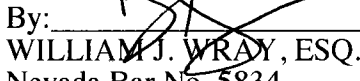
The Parties agree and stipulate that Defendant shall have an open extension to file a response to the Complaint filed on May 2, 2016, to allow the Parties an opportunity to resolve the matter.

The Parties further agree and stipulate that the requirements proscribed in F.R.C.P. 26 and LR 26-1 be tolled.

The Parties further agree and stipulate that should the Parties fail to resolve this matter, Defendant shall have ten (10) days to file a response to the Complaint.

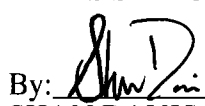
DATED this 5<sup>th</sup> day of July, 2016.

**HOLLEY DRIGGS WALCH  
FINE WRAY PUZEY & THOMPSON**

By:   
WILLIAM J. WRAY, ESQ.  
Nevada Bar No. 5834  
DONNA DIMAGGIO, ESQ.  
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Las Vegas, Nevada 89101  
*Attorneys for Defendant  
Cobra Thermosolar Plants, Inc.*

DATED this 5<sup>th</sup> day of July, 2016.

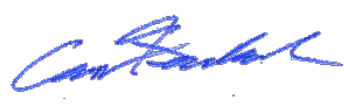
**DAVIS STIBOR**

By:   
SHAN DAVIS, ESQ.  
Nevada Bar No. 9323  
410 S. Rampart Blvd., Suite 390  
Las Vegas, Nevada 89145  
*Attorneys for Plaintiff  
The Private Bank and Trust Company*

**ORDER**

IT IS SO ORDERED.  
7-7-2016

DATED: \_\_\_\_\_

  
~~DISTRICT COURT JUDGE~~  
U.S. Magistrate